

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-
Form Complaint and:

Robert Holt, et al. v. National Football
League, et al.

Court File No. 2:12-cv-4185-AB

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFF
CLIFFORD CHARLTON**

Charles S. Zimmerman, J. Gordon Rudd, Jr., and Brian C. Gudmundson of Zimmerman Reed, L.L.P. ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Clifford Charlton only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Robert Holt, et al. v. National Football League, et al.*, No. 2:12-cv-4185-AB, in the Eastern District of Pennsylvania on July 23, 2012, for the benefit of several retired National Football League players, including Clifford Charlton.

2. Plaintiffs' counsel filed a short form complaint for Clifford Charlton on August 9, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiff Clifford Charlton and the undersigned.

4. Plaintiffs' counsel properly notified Clifford Charlton of counsel's intention to withdraw from representing him in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Clifford Charlton only in Court File No. 2:12-cv-4185-AB.

Dated: March 11, 2016

Respectfully submitted,

ZIMMERMAN REED, L.L.P.

s/ Brian C. Gudmundson

Charles S. Zimmerman (#120054)

J. Gordon Rudd, Jr. (#222082)

Brian C. Gudmundson (#336695)

1100 IDS Center, 80 South 8th Street

Minneapolis, MN 55402

Telephone: (612) 341-0400

Facsimile: (612) 341-0844

Charles.Zimmerman@zimmreed.com

Gordon.Rudd@zimmreed.com

Brian.Gudmundson@zimmreed.com